NOURSE & BOWLES, LLP Attorneys for Defendant SHANGHAI FAREAST INTERNATIONAL SHIPPING AGENCY CO. LTD. One Exchange Plaza At 55 Broadway New York, NY 10006-3030 (212) 952-6200

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NAVISION SHIPPING COMPANY A/S,

Plaintiff,

against-

YONG HE SHIPPING (HK) LTD., PROSPER SHIPPING LIMITED, JIANGSU FING AGENCY LTD., JIANGSU FAREAST INTERNATIONAL SHIPPING AGENCY LTD., . THE OLD EASTERN MEDITERRANEAN CO: SA, CHINA MARINE SHIPPING AGENCY TIANJIN COMPANY LTD., LIANYUNGANG: FAREAST INTERNATIONAL SHIPPING AGENCY CO. LTD., and SHANGHAI FAREAST INTERNATIONAL SHIPPING AGENCY CO. LTD. a/k/a FEISA,

Defendants.

PLEASE TAKE NOTICE that upon the annexed Affidavit of Armand M. Paré, Jr., declarations of Zhuo Zhonggen, Ernest Tai Ming Yang and Chu Beiping, and the exhibits thereto and the annexed memorandum of law and all prior pleadings and proceedings had herein, the Defendant, Shanghai Fareast International Shipping Agency Co. Ltd. ("Shanghai Agency"), appearing by restricted appearance pursuant to Rule E(8) of the

07 Civ. 9517(DC)

NOTICE OF MOTION

Supplemental Rules for Certain Admiralty and Maritime Claims ("Supplemental Rules") of the Federal Rules of Civil Procedure ("FRCP"), will move this Court, at a date, time and place to be set by the Court, for an order, pursuant to Supplemental Rule E(4)(f) and FRCP 12(b)(6) to vacate the attachments and dismiss Plaintiff's claim against Shanghai Agency and for further relief as the Court may deem just and proper.

Dated:

New York, New York January 30, 2008

> NOURSE & BOWLES, LLP Attorneys for Defendant SHANGHAI FAREAST INTERNATIONAL SHIPPING AGENCY CO. LTD.

By:

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TO: LENNON, MURPHY & LENNON, LLC

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